

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

AMY SHOEMAKE,

PLAINTIFF,

CIVIL ACTION NO. 3:05-cv-398-F

V.

**KNAUFF FIBER GLASS
AND ADECCO EMPLOYMENT SERVICES,**

DEFENDANTS.

UNOPPOSED

**MOTION FOR EXTENSION OF TIME FOR FILING OF
STIPULATION OF DISMISSAL**

COMES NOW the Plaintiff by and through her counsel of record, and moves this Honorable Court for a two week extension for the filing of the Stipulation of Dismissal in the above matter, and shows unto this Court the following:

1. This Court has entered an Order stating that the Stipulation of Dismissal in the above matter must be filed no later than September 27, 2005.

2. The parties have reached a settlement in this matter and the Settlement Agreement and Release has been executed by the parties, however, the payment of the settlement proceeds has not yet been received by the Plaintiff.

3. Attorney for the Defendant in the above matter is in the process of obtaining the settlement proceeds and forwarding them to the attorney for the Plaintiff.

4. Receipt of the settlement proceeds in this matter is expected within the next week to 10 days.

NOW THEREFORE, Plaintiff moves this Honorable Court for an extension of two weeks up to and including October 13, 2005, as the deadline within which to file the Stipulation of Dismissal in the above matter.

Respectfully submitted,

/s/ David R. Arendall

DAVID R. ARENDALL
STEPHANIE S. WOODARD
ALLEN D. ARNOLD
Counsel for Plaintiff

OF COUNSEL:

ARENDALL AND ASSOCIATES

2018 Morris Avenue

Birmingham, AL 35203

205.252.1550 – Office

205.252.1556 – Facsimile

CERTIFICATE OF SERVICE

I do hereby certify that on September 28, 2005, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Robert E. Poundstone, IV
Bradley Arant Rose & White LLP

Bradley T. Adler
Freeman Mathis & Gary LLP

/s/ David R. Arendall

Of Counsel